

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:  
Senaedia Michelle Lowe,  
Debtor,

CASE NO. 18-55642 - BEM

CHAPTER 7

Senaedia Michelle Lowe,  
Movant,

v.

CONTESTED MATTER

Atlantic Properties Management,  
Respondent.

**MOTION TO AVOID JUDICIAL LIEN ON EXEMPT PROPERTY**

This Motion of the Debtor respectfully represents:

1.

On April 2, 2018, Debtor filed a Voluntary Petition in Bankruptcy for relief under Title 11, Chapter 7 of the United States Code.

2.

Debtor files this Motion under 11 U.S.C. § 522(f) to avoid a judicial lien which has attached to property of the Debtor through action of law following a monetary judgment obtained by Respondent on January 8, 2013, in the Magistrate Court of Fulton County, Georgia.

3.

Said judicial lien impairs Debtor's interest in property which Debtor would ordinarily be able to exempt under 11 U.S.C. § 522 and O.C.G.A. § 44-13-100.

Wherefore, Movant prays for a judgment against Respondent for the cancellation and avoidance of the said judicial lien.

**KING & KING LAW LLC**

/s/ 

Richard McCarthy, Attorney for Debtor

GA Bar #704023

215 Pryor Street

Atlanta, GA 30303

(404) 524-6400

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**NOTICE OF REQUIREMENT OF RESPONSE TO MOTION TO AVOID  
JUDICIAL LIEN ON EXEMPT PROPERTY AND OF TIME TO FILE SAME**

NOTICE IS HEREBY GIVEN that, on May 1, 2018, a Motion to Avoid Judicial Lien on Exempt Property pursuant to 11 U.S.C. § 522(f) was filed in this case.

NOTICE IS FURTHER GIVEN that, pursuant to BLR 6008-2, Respondent must file a response to the Motion within 21 days after service, and serve a copy of said response upon Movant. If no response is timely filed and served, the Motion will be deemed unopposed and the Bankruptcy Court may enter an order granting the relief sought.

Dated: May 1, 2018

**KING & KING LAW LLC**

By: /s/ Richard McCarthy  
Richard McCarthy, Attorney for Debtor  
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215 Pryor Street  
Atlanta, GA 30303  
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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on May 1, 2018, I served a copy of the Motion to Avoid Judicial Lien on Exempt Property, together with the Notice of Requirement of Response to Motion to Avoid Judicial Lien on Exempt Property and of Time to File Same upon the following by depositing a copy of same in U.S. Mail with sufficient postage affixed thereon to ensure delivery to:

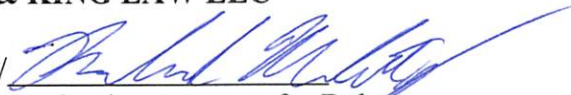
Robert Trauner  
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Austell, GA 30168

Atlantic Properties Management  
3554 Old Milton Parkway  
Alpharetta, GA 30005

Atlantic Properties Management  
aka Altantic Properties Inc,  
c/o Monica Gilroy, registered Agent  
3780 Mansell Road  
Suite 140  
Alpharetta, GA 30022

**KING & KING LAW LLC**

By: /s/   
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